## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

JLR GLOBAL, LLC, et al.

Plaintiffs,

v.

PAYPAL, INC.,

Defendant.

**CIVIL ACTION NO.: 4:22-cv-559** 

JURY TRIAL DEMANDED

## MOTION TO WITHDRAW FROM REPRESENTATION OF PLAINTIFFS

Comes now Ronald W. Burns ("Burns") of the law firm of Fresh IP PLC ("Fresh"), and current counsel for JLR Global, LLC, et al. ("Plaintiffs"), to file this Motion to Withdraw from Representation of Plaintiffs, and in support thereof would show the Court as follows:

Burns and Fresh respectfully request termination of the representation, and submit that professional considerations require termination of the representation. Burns and Fresh have made good faith efforts to address the considerations, without success.

Burns has provided Plaintiffs with notice of this withdrawal, and a copy of this motion. Burns and Fresh respectfully submit that there is good cause for granting this motion, and request entry of the appended proposed order, terminating Burns from this matter.

Dated: April 18, 2023 Respectfully Submitted,

By: /s/ Ronald W. Burns

Ronald W. Burns (*Lead Counsel*) Texas State Bar No. 24031903 Fresh IP, PLC 5999 Custer Road, Suite 110-507 Frisco, Texas 75035 972-632-9009 ron@freship.com

## **CERTIFICATE OF CONFERENCE**

The undersigned certifies on April 18, 2023, I conferred with counsel for Defendant in accordance with Local Rule CV-7(h). Defendant does not oppose this Motion, and does not oppose the relief sought in this Motion.

/s/ Ronald W. Burns Ronald W. Burns, Esq

## **CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing document was filed electronically in compliance with Local Rule CV-5. As such, the foregoing was served on all counsel of record who have consented to electronic service. Local Rule CV-5. Pursuant to Fed. R. Civ. P. 5 and Local Rule CV-5, all others not deemed to have consented to electronic service will be served with a true and correct copy of the foregoing by email, on this the 18<sup>th</sup> day of April, 2023.

/s/ Ronald W. Burns
Ronald W. Burns, Esq.